

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al.,

Plaintiffs,

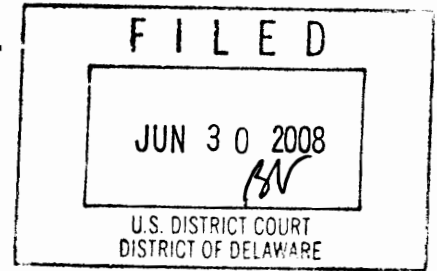
V.

STANLEY TAYLOR, et al.,

Defendants.

C.A. No. 05-823-SLR

JURY TRIAL REQUESTED



STATE OF DELAWARE)

AFFIDAVIT OF RIQUE REYNOLDS

COUNTY OF SUSSEX)

RIQUE REYNOLDS, being duly sworn, deposes and says:

1. I am a plaintiff and witnesss in this case. I make this affidavit in opposition to Defendants' Motion for Summary Judgment.

2. I was classified to work at the SCI Main kitchen between 12/27/01-11/26/02. During all relevant times I was housed in the Merit Building with minimum high/security. I had to work in the kitchen, or received a major prison infraction (Class I). If found guilty, I would received penalty points and move immediately to an higher security building such as Medium or P.I. Buildings. During my time in the kitchen, inmate kitchen workers were constantly being threaten to received a major write and move to a higher security building.

3. On information and belief, the above practice was approved by Food Service Director Christopher Senato, and Treatment Administrator Patricia Ditto who is also the supervisor of the classification staff.

4. During the time that I worked in the kitchen, I was trained by fellow inmate kitchen workers to do whatever job that was assigned to me. No DOC Food Staff ever trained me to performed any dutie.

5. I witness only rare occasion were DOC Food Staff would work side by side with inmate kitchen workers in the preparation of meals.

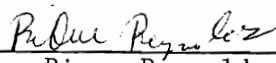
6. I personally observed and witness during the cold to freezing winter months (especially the 3:00 am to 10:30 am shift), I was force to work under extreme cold condition without the benefit of adequate winter clothing (DOC issued: jackets, thermal wear, tobagans, ect.) But DOC Food Service Staff, would be permitted to their DOC issued winter coats, ear muffs, gloves, thermal wear and hats when they leaved the heated office to entered the cold work place.

7. I personally experience working under excessive heat and extreme humidity conditions while in the dishroom area. The excessive heat and extreme humidity in that area causes the floor and wall to constantly "sweat" while making the walking conditions unsafe. I personally have fallen, and I've witness numerous of other inmates fall and been hurt. I experience lack of oxygen due to extreme humidity.

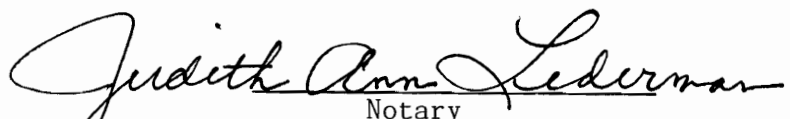
8. When I was in the SCI kitchen, the ventilation system on the "old-side" kitchen never worked. But the ventilation system in the "new-side" kitchen work adequately no matter what the out doors temperature was.

9. During the shift, inmate kitchen workers remain in the excessive heat/humidity and extreme cold during the entire shift, whereas the DOC Food Service has the luxury of going into the air condition cool and heated office during those extreme work condition.

10. I have made these statements based upon my personal knowledge and experience while as an inmate kitchen worker.


Rique Reynolds

SWORD AND SUBSCRIBED before me this 29th day of May, 2008.


Notary

JUDITH ANN LEDERMAN
NOTARY PUBLIC, STATE OF DELAWARE
My Commission Expires August 28, 2009

CERTIFICATE OF SERVICE

I, Rique Reynolds, hereby certify that I have served a true and correct copy of the attached affidavit upon the following person/s below:

NAME

STREET

CITY/STATE/ZIP

Catherine Damayandi, I.D.# 3823, Deputy Attorney General
Department of Justice
820 N. French St., 6th Floor
Wilmington, DE 19801

By placing same in a sealed, postage pre-paid envelope and depositing same in the United States Mail at Sussex Correctional Institution, P.O. Box 500, Georgetown, Delaware 19947.

This 26 day of June, 2008.

Rique Reynolds

IM: Rique Reynolds BLDG: Mecit - West
SUSSEX CORRECTIONAL INSTITUTION
P.O. BOX 500
GEORGETOWN, DELAWARE 19947

WILMINGTON DE 197
27 JUN 2008 PM 2 L



U.S. District Court
Lock Box 18
844 N. King St.
Wilmington, DE 19801

13601+3813

